



EXHIBIT B

December 13, 2023

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4. All Documents, Communications, and Things that refer or relate to Daingean Technologies Limited, the Patents-in-Suit, or this lawsuit;

5. All Documents, Communications, and Things identifying and detailing the 5G-capable or 5G-aware base stations deployed within AT&T's networks ("Accused Products");

6. All Documents, Communications, and Things detailing testing of the Accused Products;

7. All Documents, Communications, and Things identifying and detailing the software deployments (past and present versions) for the Accused Products;

8. All Documents, Communications, and Things detailing the design, development, and testing of the software deployments (past and present versions) for the Accused Products;

9. All Documents, Communications, and Things identifying and detailing the licensed features enabled on the Accused Products and the times during which those features have been enabled;

10. All Documents, Communications, and Things detailing the benefits derived from the licensed features enabled on the Accused Products;

11. All Documents, Communications, and Things detailing AT&T's investment in procurement, deployment, configuration, operation, and maintenance of the Accused Products;

12. All Documents, Communications, and Things that constitute, refer to, or relate to marketing the Accused Products or services enabled by the Accused Products;

13. All Documents, Communications, and Things that You contend evidence the level of ordinary skill in the art pertaining to the inventions claimed in the Patents-in-Suit;

14. All Documents, Communications, and Things that evidence, contradict, refer to, or relate to any secondary considerations of non-obviousness concerning the Patents-in-Suit;

15. All Documents, Communications, and Things relating to any request for indemnification You have made relating to this lawsuit;

16. All Documents, Communications, and Things relating to Your patent clearance or patent avoidance policies;

17. All Documents, Communications, and Things relating to any advantage or improvement provided by the inventions claimed in the Patent-in-Suit;

18. All Documents, Communications, and Things that constitute, refer to, or relate to the appropriate measure of damages to compensate Daingean for Your infringement of any of the Patents-in-Suit;

19. All Documents, Communications, and Things that constitute, refer to, or relate to the value or valuation of the Patents-in-Suit or any inventions of the Patents-in-Suit;

